

UNITED STATES OF AMERICA)
)
 Plaintiff,)
)
 vs.) No. 4:15 CR 346 AGF
)
 CHRISTOPHER ROE,)
)
 Defendant.)

Comes Now Defendant Christopher Roe, through his attorney, Assistant Federal Public Defender Brocca Morrison, and moves to cancel the March 9, 2016 change of plea setting and to continue the March 21, 2016 trial date to a date convenient for the Court. In support of this motion he states:

1. The Defendant and the Government are currently finalizing plea negotiations, but Defendant needs additional time to review and assess the agreement.
2. The Government has no objection to the continuance.
3. Defendant believes his request is in the interest of justice and that his need for the additional time outweighs both his interest and the public's interest in a speedy trial.
4. A signed speedy trial waiver will be filed on March 9, 2016.

Dated March 7, 2016.

/s/ Brocca L. Morrison
BROCCA L. MORRISON
Assistant Federal Public Defender

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Colleen Lang, Assistant United States Attorney.

/s/ Brocca L. Morrison

BROCCA L. MORRISON

Assistant Federal Public Defender